

UNITED STATES DISTRICT COURT
NORTHEASTERN DISTRICT OF TENNESSEE AT GREENE COUNTY

CASE No. 2:20-CV-190

CHRISTINA CHALREO BREault,
Plaintiff,

v.

AGBE BEN EPOU,
Defendant.

_____ /

FILED

SEP 11 2020

Clerk, U. S. District Court
Eastern District of Tennessee
At Greeneville

**VERIFIED COMPLAINT:
SLANDER, VIOLATION OF PRIVACY, DEPRIVATION OF CIVIL RIGHTS,
CYBERBULLYING AND ELECTRONIC HARASSMENT**

PLAINTIFF Christina Chalreo Breault sues DEFENDANT Agbe Ben Epou for damages and states:

JURISDICTIONAL ALLEGATIONS

1. At all times material to this complaint, plaintiff Christina Chalreo Breault was a resident of Greene County, Tennessee.
2. At all times material to this complaint, defendant Agbe Ben Epou was acting on the internet, presumably from his residence at Orange County, New York.
3. All acts necessary or precedent to the bringing of this complaint occurred or accrued in Greene County, Tennessee.
4. This court has jurisdiction.

GENERAL FACTUAL ALLEGATIONS

5. On August 20, 2020 plaintiff sent the defendant an email (Exhibit 2, pages 1), in response to his invitation on a video he posted on YouTube (Exhibit 1) where he mentions an opportunity to sell health insurance, and also out of amazement over his claims on many of his videos.
6. Defendant replied to plaintiff's email with a sales speech for her to watch a Zoom presentation (Exhibit 3) followed by a sequence of other emails including an invitation by plaintiff for defendant to join her online community and share his videos and books there (Exhibit 2, pages 2 and 3).
7. On August 24, 2020 plaintiff sent an email (Exhibit 2, page 7) to defendant respectfully stating her disagreement on his views regarding planet Saturn, after watching a video the defendant had sent to be posted on plaintiff's online community, along with a link to an unlisted video she posted on YouTube (Exhibit 4) explaining to him the reasons for her disagreement.

CAUSES OF ACTION

8. Defendant replied to plaintiff's email at first with an apparent positive response (Exhibit 5, page 1) but a day or two later that reply turned bitter and aggressive by a subsequent slanderous and scandalous video the defendant posted on his YouTube channel, where defendant makes the most outrageous and slanderous claims against plaintiff, including that "*she,*" the plaintiff, "*was sent to corrupt his work ... as a controlled opposition sent after him.*" Such video (Exhibit 6a) was removed by YouTube upon plaintiff's privacy claim against the video but it can be watched at the location described under Exhibit 6a as

evidence of defendant's actions against plaintiff followed by additional videos of the same nature.

9. On or around August 26, 2020, defendant posted two more videos with the clear intent to slander and cyber-attack plaintiff solely because of plaintiff's disagreement with his beliefs and nothing that plaintiff did to defendant, in complete violation of plaintiff's privacy and civil rights. Such videos have been removed; being the second by YouTube for privacy violation (Exhibit 6b) and the third by the defendant before YouTube could make a decision on the takedown of the video requested by plaintiff (Exhibit 6c). The second video was a repeat of defendant's first video as the audio was bad in parts of the first, and the third video was a repeat of his outrageous claims against plaintiff along with a physical threat to give plaintiff an "***ass whopping [plaintiff] will never forget.***" This now removed video by YouTube (Exhibit 6c), was downloaded by plaintiff to document defendant's persistent violations and cyber-attacks against plaintiff including this physical threat which can be watched/heard beginning at minute 17:20 of the mirrored video at the following locations: <https://youtu.be/cv7ekYIldw0?t=1040> or https://videos.files.wordpress.com/KEGoatz8/exhibit-8_harrassmentandthreat_hd.mp4.
10. On August 31, 2020 defendant posted a fourth video, <https://youtu.be/DIWm648wEJQ>, continuing exposing plaintiff's information shared with defendant in a private email, along with outrageous and slanderous claims against plaintiff which can be heard at the following minutes of the video (Exhibit 5):
 - a. 9:48 — defendant states that "*she*" [plaintiff] "*is addicted to lies*" [meanwhile, defendant became acquainted with plaintiff, via his YouTube channel, just a few days prior]

- b. 28:09 — defendant states plaintiff was *“giving lip service and kissing his ass”*, while in fact plaintiff was at all times during their initial interaction kind and generous to defendant by naively inviting him to join plaintiff’s online community on her website, thinking, for a moment, they shared common beliefs (Exhibit 2, pages 2 and 3).
- c. 30:57 — defendant states *“that’s how people stay in hell”*, referring to personal beliefs that plaintiff shared with him in a private email, which defendant chose to expose on the internet for no reason whatsoever other than his baseless and absurd assumptions, ensuing his cyberbullying, harassment, privacy and civil rights violations against plaintiff.
- d. 36:21 — defendant states that *“the reason plaintiff is being exposed is because plaintiff is dangerous to the Universe.”*
- e. 36:57 — defendant states that he *“decided he will keep exposing plaintiff”*, clearly and publicly informing his intentions in continuing to harass and slander plaintiff.
- f. 37:17 — defendant states that plaintiff *“was caught because defendant had bits and pieces of visuals that showed him plaintiff’s location,”* so he *“knew plaintiff was sent to corrupt his work.”*
- g. 37:49 — defendant states that he *“knows for sure that plaintiff is a part of the cabal and not someone to be trusted.”*
- h. 37:53 — defendant states that plaintiff is *“not someone to be trusted and cannot be allowed to continue spreading lies.”*

- i. 48:50 — defendant states that plaintiff *"will create chaos and darkness for eons beyond billions and billions of years ... and that's why Christina" [plaintiff] "and ILUMINA Publications" [plaintiff's business] "are dangerous."*
 - j. 50:44 — defendant states that *"the sun does not exist."*
 - k. 51:41 — defendant asks *"somebody to stop this lady"* [referring to plaintiff] and then he proceeds making preposterous assumptions and putting words in plaintiff's mouth that plaintiff never said and never meant.
 - l. 1:02:30 — defendant states that *"basically you have a lady whose part of the cabal, she [plaintiff] got caught through intuition and basic logic ... spilling off ... a lot of lies ... that will keep you [defendant's audience] in hell."*
11. On September 4, 2020, defendant posts yet a fifth video, <https://youtu.be/UL01Znffe6c>, in continuation of his harassment, cyber-attacks and civil rights violations against plaintiff, using information defendant likely obtained at plaintiff's personal blog where defendant seems to be stalking plaintiff in search of contents to create such videos. In this another slanderous and harassing video, defendant makes the following statements at the minutes indicated below:
- a. 0:34 — defendant states he *"just typed in the name and the video came up, which it was shared with him"* while most likely he found the video he's referring to on plaintiff's personal blog by reading an unrelated counter claim posted by plaintiff a year or so ago, and such behavior is consistent with the one of a stalker engaged on a rampage to cyber bully and harass plaintiff.

- b. 0:56 — defendant utters plaintiff's name, plaintiff's YouTube user name and plaintiff's business name in an attempt to continue falsely accusing plaintiff on the public internet.
- c. 1:08 — defendant falsely accuses plaintiff of "*victimizing others, and him,*" on YouTube.
- d. 1:38 — defendant falsely accuses plaintiff of "copying sections of someone's work", without any proof or even knowledge of any such incident.
- e. 1:46 — defendant states "*this is how this lady [plaintiff] makes her living ...*," implying that plaintiff engages in illegal activities against others to make money from such activities.
- f. 2:40 — defendant clearly states his intentions to continue cyberbullying, slandering and harassing plaintiff anywhere available to him on the internet.
- g. 3:03 — defendant states that "*she [plaintiff] is a fraud*" while defendant is the one committing fraud by publicly making baseless and slanderous accusations against plaintiff, using plaintiff's private emails to him in response to his public video invitation to learn more about opportunity to sell health insurance, to attack plaintiff online solely because he disagrees with plaintiff's beliefs and nothing that plaintiff did to him, which is consistent with violations of 42 U.S. Code § 1983, Tenn. Code Ann. § 29-24-104(a)(b), TN Criminal Codes Ann. § 39-17-308(1) and § 39-17-315(a)(1)(2)(3)(4), as well as violations of NY Penal Statutes Sections 240.30(1)(a)(b) and 240.31, the state of residence of defendant.

WHEREFORE, plaintiff respectfully petitions this honorable Court an Order, without prejudice,

1. for a PERMANENT INJUNCTION against defendant prohibiting defendant from any further publications regarding plaintiff along with an ORDER TO REMOVE all and any videos, internet or other postings regarding plaintiff or her business ILUMINA Publications;
2. \$5,000 (five thousand dollars) to reimburse plaintiff of any costs related to this law suit which include costs related to her taking time away from her pursuit of work and leisure to instead research, write, print and file this COMPLAINT, along punitive damages for subjecting plaintiff to such a distress, emotional anguish and public embarrassment as a result of defendant's unprovoked and scandalous actions.
3. Any further relief as the Court may deem reasonable and just under the circumstance.

Respectfully submitted,



Christina C. Breault, Plaintiff

VERIFICATION

STATE OF TENNESSEE
GREENE COUNTY

BEFORE ME personally appeared Christina C. Breault who, being by me first duly sworn and identified in accordance with Tennessee law, deposes and says:

1. My name is Christina C. Breault, plaintiff herein.
2. I have read and understood the attached foregoing complaint, and each fact alleged therein is true and correct of my own personal knowledge.

FURTHER THE AFFIANT SAYETH NAUGHT.

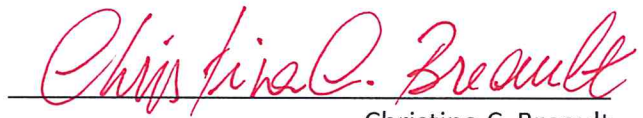
SWORN TO and subscribed before me this 11th day of September 2020.

Notary Public

My commission expires:

CERTIFICATE OF SERVICE

UNDER PERNALTY OF PERJURY, I CERTIFY that a copy of the foregoing was provided by regular U.S. mail to Agbe Ben Epou, 25 Roosevelt Ave, Middletown, NY 10940-4636 on this 11th day of September, 2020.



Christina C. Breault
P. O. Box 591
Mosheim, TN 37818

STATE OF TENNESSEE
GREENE COUNTY

BEFORE ME personally appeared Christina C. Breault who, being by me first duly sworn and identified in accordance with Tennessee law, did execute the foregoing in my presence this 11th day of September 2020.

Notary Public
My commission expires: